

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY Caption in Compliance with D.N.J. LBR 9004-1(b)	
BROWN RUDNICK LLP Robert J. Stark, Esq. Kenneth J. Aulet, Esq. Bennett S. Silverberg, Esq. Seven Times Square New York, NY 10036 Telephone: (212) 209-4800 Fax: (212) 209-4801 Email: rstark@brownrudnick.com kaulet@brownrudnick.com bsilverberg@brownrudnick.com <i>Counsel for the Official Committee of Unsecured Creditors</i> -and- GENOVA BURNS LLC. Daniel M. Stolz, Esq. Donald W. Clarke, Esq. Gregory S. Kinoian, Esq. 110 Allen Rd., Suite 304 Basking Ridge, NJ 07920 Telephone: (973) 230-2095 Fax: (973) 533-1112 Email: DStolz@genovaburns.com DClarke@genovaburns.com GKinoian@genovaburns.com <i>Local Counsel for the Official Committee of Unsecured Creditors</i>	BROWN RUDNICK LLP Stephen D. Palley, Esq. Patrick E. Gilman, Esq. 601 Thirteenth Street, NW Washington, DC 20005 Telephone: (202) 536-1700 Fax: (202) 536-1701 Email: spalley@brownrudnick.com pgilman@brownrudnick.com BROWN RUDNICK LLP One Financial Center Boston, MA 02111 Tristan Axelrod, Esq. Shari I. Dwoskin, Esq. Telephone: (617) 856-8200 Fax: (617) 856-8201 Email: taxelrod@brownrudnick.com sdwoskin@brownrudnick.com
In re: BLOCKFI INC., et al., Debtors. ¹	Chapter 11 Case No. 22-19361 (MBK) Jointly Administered

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC. (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

NOTICE OF MOTION OF GENOVA BURNS LLC FOR (I) AUTHORITY TO SEAL MEMBER INVOICES ATTACHED TO THE FIRM'S MONTHLY FEE STATEMENT FOR APRIL 2023 WHICH INCLUDES PERSONAL IDENTIFIABLE INFORMATION OF MEMBERS OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS, AND (II) GRANTING RELATED RELIEF, AND (II) GRANTING RELATED RELIEF

PLEASE TAKE NOTICE that Genova Burns LLC ("**Genova Burns**"), local counsel to the Official Committee of Unsecured Creditors (the "**Committee**") appointed in the Chapter 11 cases of BlockFi, Inc. and its affiliated debtors (collectively, the "**Debtors**"), will move on **June 20, 2023 at 11:30 a.m. (EDT)** (the "**Return Date**") before the Honorable Michael B. Kaplan, Chief United States Bankruptcy Judge for the United States Bankruptcy Court for the District of New Jersey, Trenton Vicinage, at the Clarkson S. Fisher U.S. Courthouse, located at 402 East State Street, Trenton, New Jersey 08608, in Courtroom No. 8, pursuant to 11 U.S.C. § 107(b), Fed. R. Bankr. P. 9018 and D.N.J. LBR 9018-1 (the "**Motion to Seal**") for entry of an order, substantially in the form submitted herewith, (A) for authority to file under seal member invoices attached to the *Monthly Fee Statement of Genova Burns LLC, Local Counsel to Official Committee of Unsecured Creditors for the Period April 1, 2023 through April 30, 2023* (the "**Genova Burns Monthly Fee Statement**"), filed substantially contemporaneously herewith,² and (B) granting the Committee such other and further relief as the Court deems necessary, appropriate and consistent with the goals of the Motion to Seal.

PLEASE TAKE FURTHER NOTICE that, in accordance with D.N.J. LBR 9013-2(a)(2), objections, if any must be filed with the Clerk of the United States Bankruptcy Court, 402

² A redacted version of the GB Monthly Fee Statement has been filed immediately prior to the filing of this Motion to Seal. An unredacted version of the GB Monthly Fee Statement is being filed immediately after the filing of this Motion to Seal in accordance with this Court's procedures for electronically requesting that a document be sealed (*see Process to Electronically Request that a Document be Sealed* (<http://www.njb.uscourts.gov/content/process-electronically-request-document-be-sealed>)).

East State Street, Trenton, New Jersey 08608, and served upon Genova Burns, LLC, Attn: Donald W. Clarke, Esq., 110 Allen Road, Ste. 304, Basking Ridge, New Jersey so they are received by **no later than seven (7) days before the Return Date.**

PLEASE TAKE FURTHER NOTICE that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: May 25, 2023

GENOVA BURNS LLC

By: /s/ Donald W. Clarke
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